1 2 3	MICHAEL F. BOHN, ESQ. Nevada Bar No.: 1641 mbohn@bohnlawfirm.com NIKOLL NIKCI, ESQ. Nevada Bar No. 10699			
	nnikci@bohnlawfirm.com			
4	MICHAEL F. BOHN, ESQ., LTD.			
	2260 Corporate Circle, Suite 480 Henderson, NV 89074			
6	(702) 642-3113/ (702) 642-9766 FAX Attorney for defendant Flying Frog			
7	Avenue Trust			
8	LINUTED CTATES DISTRICT, COLUDT			
9	UNITED STATES DISTRICT COURT			
10	DISTRICT OF NEVADA			
11		CACENO 2.17 01022 ICM CWE		
12	PROF-2013-S3 LEGAL TITLE TRUST, BY U.S. BANK NATIONAL ASSOCIATION, AS LEGAL TITLE TRUSTEE,	CASE NO.: 2:17-cv-01933-JCM-GWF		
13	Plaintiff,			
14	VS.			
15	FLYING FROG AVENUE TRUST,			
16	Defendant.			
17	Defendant.			
18				
19	CTIDIII ATION AND ODDED TO EVTEN	UD DICDOCITIVE MOTION DE ADI INE		
20	STIPULATION AND ORDER TO EXTEN	<del>-</del>		
	(THIRD R			
21	Defendant, Flying Frog Avenue Trust (hereinafter "Flying Frog" or "Defendant"), by and through			
22	its counsel of record, the Law Offices of Michael F. Bohn, Esq., Ltd., plaintiff, PROF-2013-S3 Legal			
23	Title Trust, by U.S. Bank National Association, as Legal Title Trustee (hereinafter "Plaintiff" or "U.S.			
24	Bank"), by and through its attorney, ROCK K. JUNG, ESQ., of the law firm of Wright, Finlay & Zak,			
25	LLP, and Defendant Red Rock Financial Services, LLC (hereinafter "RRFS"), by and through its counsel			
26				
27				
28	1			
	II -			

	Case 2:17-	cv-01933-JCM-GWF Document 41 Filed 05/10/18 Page 2 of 5		
1	of record, Ste	ve Scow, Esq. of Koch & Scow, LLC, and hereby stipulate and agree to extend discovery		
2	and dispositive motion deadlines.			
3	Α.	DISCOVERY COMPLETED		
4	1.	Plaintiffs' Initial and First Supplemental Disclosures.		
5	2.	Plaintiff's Subpoena Duces Tecum to Venezia Community Association and Red Rock		
6	Financial Services.			
7	3.	Plaintiffs' written discovery (interrogatories, requests for production and requests for		
8	admission) to Flying Frog Avenue Trust.			
9	4.	Defendant Flying Frog Avenue Trust's Initial Disclosures.		
10	5.	Flying Frog Avenue Trust's responses to Plaintiffs' written discovery (requests for		
11	production, requests for admission, interrogatories).			
12	6.	Plaintiff's Expert Disclosure		
13	7.	Plaintiff's written discovery (interrogatories, requests for production and requests for		
14	admission) to Red Rock Financial Services, LLC.			
15	8.	Red Rock Financial Services, LLC's Initial Disclosures.		
16	9.	Red Rock Financial Services, LLC's responses to Plaintiffs' written discovery (requests		
17	for production, requests for admission, interrogatories).			
18	10.	Flying Frog Avenue Trust's written discovery (interrogatories, requests for production and		
19	requests for admission) to Plaintiff.			
20	11.	Plaintiff's responses to Flying Frog Avenue Trust's written discovery (interrogatories,		
21	requests for production and requests for admission).			
22	В.	DISCOVERY THAT REMAINS TO BE COMPLETED		
23	1.	Plaintiff's Supplemental responses to Flying Frog Avenue Trust's written discovery		
24		1 (- C 1 ( )		

24 (interrogatories and requests for production).

## C. REASON WHY DISCOVERY HAS NOT BEEN COMPLETED

Good cause and excusable neglect justify an extension of the deadlines at this time. Defendant, Flying Frog Avenue Trust, has requested that Plaintiff supplement its responses to their discovery requests. Plaintiff agreed to supplement the written discovery and has been working with defendant Flying Frog Avenue Trust to address it concerns. Therefore, with the hope of completing discovery without requiring court intervention, the parties are desirous to extend the dispositive motions deadline at this time.

## D. PROPOSED PRE-TRIAL DEADLINES AND DISCOVERY SCHEDULE

9	EVENT	CURRENT DATE	PROPOSED DATE
10	Discovery Cut-Off	March 13, 2018	N/A
11	Motions to Amend Pleadings/Add Parties	November 6, 2017	N/A
12	Expert Disclosures	December 6, 2017	N/A
13	Rebuttal Expert Disclosures	January 5, 2018	N/A
14	Dispositive Motions	May 14, 2018	May 29, 2018
15	Joint Pre-Trial Order	June 4, 2018	June 19, 2018

## E. CURRENT TRIAL DATE

A trial date is not currently set for this matter.

18 //

1

2

3

4

5

8

1

1

1

1

1

1

16

17

19 //

20 //

21 //

22 //

23 //

24 / /

25 / / 26 / /

27

28

1	<sub>1</sub> F. CONCLUSION			
2	2 Accordingly, for good cause shown, excu	Accordingly, for good cause shown, excusable neglect, and the joint work of the parties to		
3	3 conclude discovery amicably the parties respectfully	y request that the Court enter the accompanying order		
4	to extend the aforementioned dispositive motions of	to extend the aforementioned dispositive motions deadline in this matter.		
5	5 IT IS SO STIPULATED.	IT IS SO STIPULATED.		
6	DATED this 10th day of May, 2018.	DATED this 10th day of May, 2018.		
7	7 WRIGHT, FINLAY & ZAK, LLP	LAW OFFICES OF MICHAEL F. BOHN, ESQ., LTD.		
8	8 /s/ Rock K. Jung, Esq.	/s/ Michael F. Bohn, Esq.		
9	EDGAD C SMITH ESO	MICHAEL F. BOHN, ESQ. Nevada Bar No. 1641		
10	E Mail, agaith @yymightlagal nat	E-Mail: <a href="mailto:mbohn@bohnlawfirm.com">mbohn@bohnlawfirm.com</a> NIKOLL NIKCI, ESQ.		
11	Novada Dan No. 10006	Nevada Bar No. 10699 E-Mail: nnikci@bohnlawfirm.com		
12	117705 W C-1 A C 200	2260 Corporate Circle, Suite 480 Henderson, NV 89074		
13	A 44 C 1 - : - 4:CCDD OF 2012 C2 I 1	Attorneys for defendant Flying Frog Avenue Trust		
14	as Legal Title Trustee			
15	5 KOCH & SCOW LLC			
16	/s/ Steve B. Scow, Esq.			
17	Steve B. Scow, Esq. Nevada Bar No. 9906 E-Mail: sscow@kochscow.com 11500 South Eastern Avenue, Suite 210			
19	Attorneys for detendant			
20				
21				
22	2 IT IS SO ORDERED.	Jeorge Foley Jr.		
23	3 UNIT	ED STATES MAGISTRATE JUDGE		
24				
25		ED: 5-11-2018		
26				
27				
28	8	4		

## Case 2:17-cv-01933-JCM-GWF Document 41 Filed 05/10/18 Page 5 of 5 Respectfully submitted by: LAW OFFICES OF MICHAEL F. BOHN, ESQ., LTD. By: /s/ Michael F. Bohn, Esq. MICHAEL F. BOHN, ESQ. NIKOLL NIKCI, ESQ. 2260 Corporate Circle, Ste. 140 Las Vegas, NV 89074 Attorneys for defendant Flying Frog Avenue Trust